

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION at DAYTON**

IN RE:	}	CASE NO. 22-31447
	}	
LAWRENCE LEE ADAMS	}	CHAPTER 13
	}	
DEBTOR	}	JUDGE HUMPHREY

**DEBTOR'S APPLICATION TO EMPLOY ATTORNEY, BRIAN DANIEL FLICK, ESQ.,
AS SPECIAL COUNSEL**

COMES NOW LAWRENCE LEE ADAMS, Debtor in the above-styled and numbered cause, and files this Application to Retain Special Counsel and would respectfully show the Court as follows:

1. Debtor desires to retain Special Counsel to assist in the prosecution of claims against his mortgage lender, Creditor, Cincinnati Capital Holdings, LLC, as well as the Debtor's pending Objection (Doc. 43) to the said Creditor's Proof of Claim No. 10.
2. To that end, the Debtor has procured the services of Brian Daniel Flick, Esq. and The Dann Law Firm (hereinafter collectively referred to as the "Attorneys") who maintain offices located at 220 Mill Street, Milford, Ohio 45150 and 15000 Madison Avenue, Lakewood, Ohio 44107 with a telephone number of (513) 645-3488.
3. To the best of the Debtor's knowledge, Attorneys are not currently representing the Debtor, other than in connection with the above-referenced matters, and have no interest adverse to the Debtor or the Bankruptcy Estate. (See the Declaration of Brian D. Flick, Esq. which is attached hereto as Exhibit "A" and incorporated by reference for all purposes as if fully set forth herein).

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4. A copy of the Fee Agreement between the Debtor and the Attorneys is attached as an exhibit to the said Affidavit and incorporated by reference for all purposes as if fully set forth herein. (*See* Exhibit “A”).

WHEREFORE, Debtor moves the Court for approval of the employment of the Attorneys to represent him in the above-referenced matters and the Attorneys be authorized to be compensated pursuant to Federal Rule of Bankruptcy Procedure 2016 upon the approval of an Application for Compensation to be filed by the Attorneys before such compensation is received or paid.

Respectfully submitted,

/s/ Gregory M. Wetherall

GREGORY M. WETHERALL (OH 0067307)
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NOTICE OF DEBTOR'S APPLICATION TO EMPLOY SPECIAL COUNSEL

Attorney for Debtor has filed with the Court an Application to Employ Special Counsel.

Your rights may be affected. You Should Read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you want to object to this Motion, or if you want the Court to consider your views on this matter, then, within twenty-one (21) days of the date of this Notice, you or your Attorney must:

File with the Court a written response stating your position at:

Clerk, U.S. Bankruptcy Court
Attn: Clerk of Court
120 West Third Street
Dayton, Ohio 45402

If you mail your request or response to the Court for filing, you must mail early enough so the Court will receive it on or before the date stated above.

You must also mail a copy to:

Office of the United States Trustee
170 North High Street, Suite 200
Columbus, Ohio 43215-0000

John G. Jansing, Esq.
Chapter 13 Trustee
409 E. Monument Avenue, Suite 410
Dayton, Ohio 45402

Gregory M. Wetherall, Esq.
Attorney for Debtor
4030 Mount Carmel Tobasco Road, Suite 122
Cincinnati, Ohio 45255

If you or your attorney do not take these steps, the Court may decide that you do not oppose the Motion and may enter an order granting the same.

Date: February 27, 2023

/s/ Gregory M. Wetherall

GREGORY M. WETHERALL
Attorney for the Debtor

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